

**IN UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
AT NASHVILLE**

**JANE DOE,** )  
*Plaintiff,* )  
v. )  
                        )     **Case No. 3:25-CV-131**  
**BELMONT UNIVERSITY,** )  
*Defendant.*       )

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**MOTION FOR CONTEMPT**

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COMES NOW, the Plaintiff, Jane Doe (hereinafter “Plaintiff”), by and through counsel, and hereby moves for a finding that Defendant is in contempt of court and an order imposing sanctions for reasons discussed in Plaintiff’s accompanying *Memorandum of Law*.

Pursuant to Local Rule 7.01, counsel for Plaintiff has conferred with counsel for Defendant, and this motion is opposed.

**WHEREFORE**, premises consider, Plaintiff prays:

1. For a finding that Defendant is in contempt of court due to filing an unredacted exhibit containing Plaintiff’s name, address, and student identification number;
2. For an order imposing sanctions on Defendant, including a fine for each day Plaintiff’s name has been public and Plaintiff’s attorney’s fees for bringing this motion and working to seal Plaintiff’s name and address;
3. For an order prohibiting Defendant from making future references to Plaintiff’s name, address, and other personal identifiers; and
4. For any other relief this Court deems necessary.

Respectfully submitted this 30th day of April 2025.

/s/ DAVID C. BRUST  
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**CERTIFICATE OF SERVICE**

I hereby certify that on April 30, 2025, the foregoing *Motion for Contempt* was served via the Court's ECF system upon the following:

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